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and CHRIS SHAHEEN

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

In Re: KINGSWAY CAPITAL PARTNERS, LLC	Chapter 11 Bankruptcy Case No.: 14-31532 HLB
KINGSWAY CAPITAL PARTNERS, LLC, Plaintiff, vs. SLAVIK S. LEYDIKER, JAIME ALVAREZ, DAN BEATTY, STEVE CARMASSI, CUSTARD INSURANCE ADJUSTERS, FIRST MERCURY INSURANCE NAIC #10657, BRET HUSTED, INTER WEST INSURANCE SERVICES, JEFFREY JOHNSON, JENNIFER LOSKAMP, MARIA SOSA'S INSURER, NEW BUYER OF SUBJECT PROPERTY, ROOF GUARD COMPANY, INC., CHRIS SHAHEEN, MARIA SOSA, SOSA MARIA G. TRUST, AND STATE COMPENSATION INSURANCE FUND (CA) NAIC #35076 Defendants.	Adversary Proceeding No. 14-03149 HLB STATUS CONFERENCE STATEMENT Date: January 22, 2015 Time: 2:00 p.m. Dept: Courtroom 23 Judge: Hon. Hannah L. Blumenstiel

1 COMES NOW, JENNIFER LOSKAMP and CHRIS SHAHEEN and submit this Status
2 Conference Statement:
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5 **I. STATUS OF ADVERSARY PROCEEDING**

6 **A. Adversary Proceeding.**

7 Plaintiff's adversary proceeding lists 16 defendants. It is based on allegations relating to
8 a commercial lease entered into between Plaintiff and defendant Maria Sosa. The only allegation
9 against LOSKAMP and SHAHEEN identifies them as "realtors representing a proposed buyer."
10 There are no charging allegations against either LOSKAMP or SHAHEEN. Further the claims
11 do not pertain to a proposed sale.

12 Accordingly, on December 10, 2014, LOSKAMP and SHAHEEN filed a Motion to
13 Dismiss Adversary Proceeding (Docket No. 25). The Motion is set to be heard January 22, 2015.
14 (*Id.*)

15 **B. Initial Disclosure/Discovery Plan.**

16 Plaintiff has not contacted LOSKAMP/SHAHEEN pertaining to this adversary
17 proceeding regarding the court's Order Re Disclosures and Discovery Conference (Docket No.
18 3). Thus, there has been no conference relating to initial disclosures and/or discovery. As
19 LOSKAMP and SHAHEEN have filed a motion to dismiss, any discussion regarding a discovery
20 plan is premature.

21 **C. Pending Motions.**

22 In addition to the Motion to Dismiss, defendants Dan Beatty, Slavik Leydiker and Maria
23 Sosa filed a "Motion to Set Aside Entry of Default" (Docket No. 33). That hearing is set for
24 January 29, 2015. (*Id.*)

25 ANITRA PRASAD, who was not directly named in the complaint but instead was
26 "named" as the "Proposed New Buyer of Subject Property yet to be identified," filed on January
27 13, 2015, a motion seeking an order to strike and dismiss complaint (Docket No. 38). That
28 hearing is set for February 12, 2015 (Docket No. 39).

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Respectfully submitted,

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